

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK

SUSAN MOSES, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

APPLE HOSPITALITY REIT INC.,

Defendant.

Case No. 1:14-cv-03131-SMG

Honorable Steven M. Gold

**INTERIM CLASS COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES  
AND REIMBURSEMENT OF LITIGATION EXPENSES**


**PLEASE TAKE NOTICE** that upon the accompanying Declarations of Christopher J. Gray, Jeffrey M. Salas and James J. Eccleston dated December 29, 2017, the exhibits annexed thereto, the accompanying Memorandum of Law, and all of the prior pleadings and proceedings herein, Interim Class Counsel Salas Wang, LLC, Eccleston Law, LLC and Law Office of Christopher J. Gray, P.C. (“movants”) will move the Court for an Order pursuant to Fed. R. Civ. P. 23(h) and 54(d)(2): (1) awarding movants attorneys’ fees from the common fund in the sum of \$1,833,333.33; (2) granting movants reimbursement of litigation expenses in the sum of \$24,844.66; and (3) granting an incentive award to Plaintiff and Class Representative Susan Moses in the sum of \$10,000.00, before the Hon. Steven M. Gold, U.S.M.J., in Courtroom 13-D of the U.S. Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, on the 16<sup>th</sup> day

of January, 2018 at 4:30 o'clock in the afternoon of that day, or at such other date and time as may be designated by the Court.

Dated: New York, New York  
December 29, 2017

Respectfully submitted,

LAW OFFICE OF  
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